

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Chapter 13
Christine Shifflett	:	
	:	Case No.: 22-11648-AMC
Debtor(s)	:	

MOTION TO APPROVE POST CONFIRMATION DISTRIBUTION

The Debtor through their undersigned Counsel humbly request that this Honorable Court grant the Debtor's Motion to Approve Post Confirmation Distribution and avers the following.

1. Debtor filed a Bankruptcy Petition under Chapter 13 of the Bankruptcy Code on June 24, 2022.
2. Debtor's Chapter 13 Plan was confirmed on March 08, 2023.
3. Debtor's Chapter 13 Plan provided for pro-rata distribution to unsecured creditors.
4. Debtor is in month 28 of the proposed 60-month length of their plan.
5. Debtor suffered a personal injury because of which he filed an action in the Superior Court of New Jersey, County of Cape May; Christine Shifflett vs. Shoprite of Rio Grande, et al., CPM-273-22.
6. Debtor's personal injury action has tentatively been settled in the amount of ninety thousand dollars (\$90,000).
7. The following fees and costs are owed by debtor from the personal injury action from the distribution:

- a. Cape May County Superior Court (Complaint Filing) \$300.00
- b. Cape May Regional Urgent Care (Medical Records) \$10.00
- c. Central Montgomery Orthopedics (Medical Records, exam and narrative) \$2,529.41
- d. CIOX (Medical Records) \$146.67
- e. Court House Legal (Service Fees) \$300.00
- f. FedEx (Delivery Fee) \$66.15
- g. Law Office of Vincent J. Clecka (Flash Drives) \$28.00
- h. Charles Jones (Child Support Search) \$10.00

i.	Moore Engineering (Expert Site Inspection/Reports)	\$4,828.12
j.	New Britain Surgery Center (Medical Records)	\$105.25
k.	Tate & Tate (Court Reporting)	\$95.00
l.	Tri Valley Primary Care (Medical Records)	\$124.71
m.	Veritext (Deposition fees and transcripts)	\$636.00
n.	Law Offices of Vincent Ciecka Attorney Fees	\$26,940.23
o.	Less Private Health Care Lien/Blue Cross/Blue Shield	\$11,879.72
p.	Medicare: Conditional Payment	\$96.45

8. Debtor's net distribution from the personal injury action is estimated to be \$27,900.00 from the settlement.
9. Non-priority unsecured claims total approximately \$15,967.00.
10. Debtor proposes paying all timely filed unsecured non-priority claims at 100%.

WHEREFORE, Debtor respectfully requests that her Motion to Approve Post Confirmation Distribution be granted.

Dated: October 15, 2024

/s/ Brad J. Sadek

Brad J. Sadek, Esquire
Sadek Law Offices
1500 JFK Boulevard, Suite 220
Philadelphia, PA 19102
(215) 545-0008
brad@sadeklaw.com

Counsel to the Debtor